

EXHIBIT 41

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF DAVID PATRICK

Pursuant to 28 U.S.C. § 1746, I, David Patrick, hereby declare as follows:

1. I am a resident of the State of Washington. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by Western Washington University (WWU) as Vice Provost for Research. In my role as Vice Provost for Research, I oversee sponsored research, grants and contracts for WWU, a position I have held since 2020.

3. WWU is a public comprehensive institution dedicated to serving the people of the State of Washington. Together our students, staff, and faculty are committed to making a positive impact in the state and the world, with a shared focus on academic excellence and inclusive achievement.

4. Washington Campus Coalition for the Public Good (WACC), hosted by WWU, was established in 1992 as a network of higher education institutions committed to advancing the public purpose of colleges and universities, educating students for the workforce and civic leadership, and working in partnership to cultivate vital and sustainable communities. WACC's 46 members represent tribal, rural, and urban colleges, community and technical colleges, and four-year universities in Washington and Idaho.

5. WACC has extensive experience in kindergarten through college-level education and administering federal grants. Since 2021, as part of WACC's AmeriCorps State and National grant, 748 WACC AmeriCorps members have served or are serving at 34 higher education institutions across Washington and Idaho, contributing 389,671 total service hours to their

communities to date. Together, these members improved the academic engagement of 17,374 at-risk, low-income K-12 students through mentoring and tutoring, improved higher education attainment and persistence for 24,990 marginalized college/university students, provided food security and mental and medical health supports for 99,052 individuals, delivered 935,570 pounds of food, taught 9,628 community members environmental stewardship, and improved 576 acres of public and tribal land to increase ecosystem resilience.

6. WACC AmeriCorps members provide critical support to Washington and Idaho higher education institutions and community organizations. WACC service members are placed in the areas of highest need focusing on student success, community health, food security, and environmental stewardship. For example, WACC AmeriCorps members provide mentoring, tutoring, and peer support services for low-income K-12 and college/university students, operate food banks on campus and contribute basic needs and housing supports to vulnerable individuals, increase access to critical mental health needs through counseling, outreach, coaching, and referrals, teach environmental education to marginalized communities, and restore at-risk ecosystems.

7. WACC has overseen AmeriCorps multi-state grants for almost three decades including the Civic Leadership & Engagement Corps (CLEC) (2021-present), College Access Corps (2014-2021), Retention Project (2007-2013), VISTA (2004-2021), Students in Service (1997-2012), and Learn and Serve America programs (1997-2003, 2006-2011). Since 2004, WACC has received nearly \$26 million in competitive and formula AmeriCorps grants and has enlisted 19,678 AmeriCorps members who have served in 22 states. Besides Washington and Idaho, WACC members have served in states including Alabama, California, Florida, Hawaii, Illinois, Louisiana, Massachusetts, Maryland, Maine, Minnesota, Montana, New Hampshire,

Nevada, New York, Ohio, Oklahoma, Oregon, Texas, Vermont, and West Virginia.

8. The details of WACC's funding since 2004 are as follows:

Current (Terminated Program):

CLEC Grant 21EDIWA001	# of AmeriCorps Members	AmeriCorps Funds	In-Kind + Cash Support	Total
2023-Present	337	\$2,673,290.00	\$503,500.00	\$ 3,176,790.00
2022-23	214	\$2,087,640.00	\$483,500.00	\$ 2,571,140.00
2021-22	197	\$1,575,395.00	\$483,500.00	\$ 2,058,895.00

Historical Program Dollars & Members:

Grant Year	AmeriCorps Grant Type	Total AmeriCorps Funds
2008-2021	VISTA Programs	\$177,200.00
2002-Present	AmeriCorps State & National	\$16,380,826.00
2019-2019	Training & Technical Assistance	\$8,600.00
2000-2013	Higher Education	\$3,050,000.00

Total AmeriCorps Funds Received: \$25,952,951

Total AmeriCorps Members: 19,678

9. On April 15, 2025, I learned from Washington's Office of Financial Management (OFM) that AmeriCorps members had been placed on administrative hold status effective immediately and would be eligible for a "compelling personal circumstance" program exit on April 30. The stated reason was: "In alignment with the Trump-Vance administration priorities and Executive Order 14,222 'Implementing the President's Department of Government Efficiency Cost Efficiency Initiative,' AmeriCorps NCCC is working within new operational parameters that impact the program's ability to sustain program operations."

10. I later learned from OFM that more than 75 percent of AmeriCorps staff were also

placed on administrative leave, leaving only a small team left in each department. The affected staff include those responsible for administering grants for AmeriCorps State and National programs, such as the Civic Leadership & Engagement Corps (CLEC).

11. On April 25, 2025, I was notified that WACC's CLEC grant was terminated because it "no longer effectuates agency priorities." The termination notice directed that all award activities cease "immediately," and stated that the termination decision was not administratively appealable.

12. WACC'S CLEC grant supported 24 service members who serve at higher education institutions and community organizations across Washington. This includes 13 full-time stipend members, 5 half-time stipend members, and 6 part-time Education Award-only members. A total of 337 members have served in our most recent grant year (45 full-time, 38 half-time, 252 part-time). Service members receive:

- a. A bi-weekly living allowance (for stipend members);
- b. Health care benefits (for eligible full-time members);
- c. Childcare assistance (if eligible);
- d. An AmeriCorps Education Award, which may be used toward school tuition, most federally approved student loans, or future education costs for up to seven years; and
- e. Professional development opportunities.

13. WACC's CLEC grant was scheduled to run through July 31, 2025. As of April 25, 2025, WACC had yet to draw down \$92,322.89 under the grant award. Now that the grant has been terminated, WACC will not receive the remaining funding that it had anticipated.

14. WACC cannot offer comparable benefits to service members absent AmeriCorps

funding. Thus, WACC will have to terminate service members' benefits. This will prevent some or all of WACC's 24 AmeriCorps service members from continuing to serve.

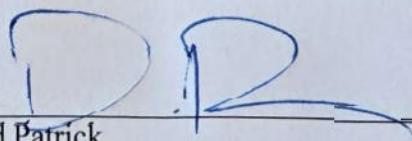
15. Loss of WACC's CLEC grant has and will cause significant harm to WACC, WWU, and WACC's member institutions and their students. As many as 5,372 service hours will be lost in mentoring and academic engagement programs for low-income, at-risk K-16 students, providing food security and basic needs, mental/medical health access, environmental education, and environmental restoration. For example, WACC AmeriCorps members had, before grant termination and the stop-work order, served at Tacoma Community College providing entry services support for prospective and new students. This included providing inclusive outreach, especially in rural areas, personalized coaching through the college admissions and enrollment process, and promoting a sense of belonging on campus for new students. These services have been significantly curtailed, resulting in closing TCC's Welcome Center for part of each week and reducing community outreach events, especially visits to local high schools. Edmonds College's AmeriCorps Food Pantry Engagement Specialist was providing food distribution, outreach, and educational programs to alleviate food insecurity and remove some of the barriers that cause students to withdraw from classes. The loss of this member's service is having immediate detrimental effects including compromising food pantry operations, reducing operating hours, disrupting donation drives and community partnerships, and decreasing volunteer capacity and student engagement. Other WACC AmeriCorps members provided critical environmental restoration and comprehensive support systems on their campuses and communities to empower low-income, at-risk students, foster community, and directly contribute to vulnerable students' academic success and retention. Those services can now no longer be provided, to the detriment of all member colleges and their students.

16. In addition to these direct cuts, I am aware that the Administration is imminently reducing AmeriCorps Agency staff by up to 90%.

17. The loss of AmeriCorps staff also will lead to delays in the agency's review of competitive grant applications, imperiling WACC's receipt of funds for future fiscal years. WACC has two pending FY25 AmeriCorps grant applications in which reviews have been delayed: A \$2,098,060 AmeriCorps State and National application and a \$886,267 Serve Washington formula funding application. Delaying review of these grants is imperiling the CLEC AmeriCorps program; campus partners will not be able to recruit members in time before the program start August 1, 2025, and many are cancelling critical programs due to funding uncertainty. WACC is actively pursuing other funding opportunities due to these delays but at this point no alternate funding has been secured.

18. The support that WACC members provide to Washington and Idaho's higher education institutions and communities is critical and irreplaceable. WACC can deploy service members on projects across the region that local community organizations and institutions would not otherwise have the capacity to support. The loss of a substantial number of WACC members due to AmeriCorps' effective closure and decision to terminate WACC's CLEC grant funding will be keenly felt.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 6, 2025, at Bellingham, WA.



David Patrick
Vice Provost for Research
Western Washington University (WWU)